

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**Case No. 15-CR-244**

**VYACHESLAV TELYATITSKIY**  
**aka SLAVA TELYATITSKIY,**

Defendant.

---

MOTION TO DECLARE CASE *COMPLEX*

---

COMES NOW the above-named defendant and moves the court for an order designating the instant matter to be *complex*.

The defendant is the remaining alleged co-actor in a fraud scheme involving the international utilization of stolen identities; unauthorized filings of tax returns; transmission of refund amounts from the tax returns to credit and debit cards; shipment of the cards to the United States from Ukraine or Russia or other locations; laundering the funds from the cards; and returning the amount to persons and places in Europe.

The defendant is charged in the instant individual indictment, but the allegations are essentially the same as those set forth in Case No. 15-CR-00116, *U.S. v. Vladimir Sonin et al.* The court declared that matter to be complex. The allegations are based on different law enforcement efforts to investigate these matters, including the FBI and IRS. The claimed offenses purportedly involved the use of over 1500 fraudulently obtained victims'

identification information and at least as many laundering transactions. The discovery, which was received this week, provides an initial offering of at least 12,000 pages. However, the discovery transmittal document notes that there is additional material which will be provided once defense counsel has delivered an external hard drive to the Office of the U.S. Attorney. That volume of discovery is either eight or sixteen terabytes of computer information of which approximately one terabyte is not simply film materials. Additionally, there is other evidence which was seized during the execution of search warrants and which will be made available upon contacting the IRS.

It is believed that defense counsel will have to obtain, through CJA auspices, both the external hard drive and a software platform to properly access the voluminous productions of discovery in this matter. Counsel has conferred with AUSA Stephen Ingram, who has stated that he joins in the request to designate this matter as *complex*. Accordingly, the parties request the court to enter such order.

Dated at Milwaukee, Wisconsin, this 8<sup>th</sup> day of June, 2017.

Respectfully submitted,

*/s/ Robert G. LeBell*

---

Robert G. LeBell, 01015710  
LeBELL, DOBROSKI, MORGAN & MEYLINK, LLP  
309 N. Water Street, Suite 350  
Milwaukee, WI 53202  
Telephone: (414) 276-1233  
Facsimile: (414) 276-5874  
[dorbell@ldm-law.com](mailto:dorbell@ldm-law.com)